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[Proposed] Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

JAMES DOLAN, On Behalf of Himself and
 All Others Similarly Situated,

Plaintiff,

vs.

INFINEON TECHNOLOGIES AG, et al.,

Defendants.

No. C-04-4156-JW

CLASS ACTION

PLAINTIFFS' JOINT STIPULATION AND
 [PROPOSED] ORDER TO CONSOLIDATE
 THE ACTIONS, APPOINT LEAD
 PLAINTIFF, AND TO APPROVE LEAD
 PLAINTIFF'S SELECTION OF CO-LEAD
 COUNSEL

1 WHEREAS, on or about September 30, 2004, the above-captioned *Dolan v. Infineon*
2 *Technologies AG, et al.*, 04-CV-4156 (the “*Dolan Action*”), was filed in the United States District
3 Court for the Northern District of California and alleged violations of the federal securities laws on
4 behalf of a class of purchasers of Infineon Technologies AG (“Infineon”) securities from March 13,
5 2000, to July 19, 2004. On October 6, 2004, the complaint in the action captioned *Christierson v.*
6 *Infineon Technologies AG, et al.*, 04-CV-7917, was the first action filed in the Southern District of
7 New York. On October 28, 2004, the complaint captioned *Burger v. Infineon Technologies AG, et*
8 *al.*, 04-CV-8513, was filed in the Southern District of New York on behalf of purchasers of Infineon
9 securities between March 13, 2000, and September 15, 2004 (the “Class Period”);

10 WHEREAS, pursuant to §21D(a)(3)(A) of the Securities Exchange Act of 1934 (“Exchange
11 Act”), 15 U.S.C. §78u-4(a)(3)(A), the plaintiff in the *Dolan Action* caused notice to be published on
12 *Business Wire* on September 30, 2004, which informed class members of their right to seek
13 appointment as lead plaintiff by filing a motion with the Court no later than November 29, 2004;

14 WHEREAS, on November 29, 2004, plaintiff Reinhard Schroeder, pursuant to §21D of the
15 Private Securities Litigation Reform Act of 1995 (“PSLRA”), timely filed a motion seeking
16 consolidation of the above-captioned actions, his appointment as Lead Plaintiff, and approval of his
17 selection of Murray, Frank & Sailer LLP (“Murray Frank”) as Lead Counsel in the proposed
18 consolidated cases. During the Class Period, Schroeder purchased 84,900 shares of Infineon on the
19 Frankfurt Stock Exchange and suffered losses of \$892,143.94 on his transactions;

20 WHEREAS, on November 29, 2004, plaintiffs the Central Laborers’ Retirement Fund, the
21 Charter Township of Clinton Police & Fire Retirement System, and Mark and Karen Gurvey
22 pursuant to §21D of the PSLRA, timely filed a motion seeking consolidation of the above-captioned
23 actions, their appointment as Lead Plaintiff, and approval of their selection of Lerach Coughlin Stoia
24 Geller Rudman & Robbins LLP (“Lerach Coughlin”) as Lead Counsel in the proposed consolidated
25 cases. During the Class Period, Charter Township of Clinton Police & Fire Retirement System
26 purchased 2,100 Infineon American Depositary Receipts and suffered losses of \$77,437.50. Mark
27 and Karen Gurvey purchased 2,250 shares of Infineon common stock traded on the Frankfurt Stock
28 Exchange and suffered losses of \$53,012.46 on their transaction;

1 WHEREAS, there are no other motions to be appointed lead plaintiff and to approve lead
2 plaintiff's selection of lead counsel pending in the Southern District of New York or the Northern
3 District of California;

4 WHEREAS, pursuant to the PSLRA, the Court is to presume that the "most adequate
5 plaintiff" is the person or group of persons who, "in the determination of the court, has the largest
6 financial interest in the relief sought by the class." 15 U.S.C. §78u-4(a)(3)(B)(iii)(I);

7 WHEREAS, each of the movants understands the importance of supervising and monitoring
8 the case and has determined that to best protect the interests of the class it would be more efficient to
9 propose a consensual resolution of this matter rather than to proceed with competing lead plaintiff
10 motions. As a result, the movants have reached an agreement that resolves the pending motions and
11 provides for the joint appointment of Reinhard Schroeder, Charter Township of Clinton Police &
12 Fire Retirement System and Mark and Karen Gurvey as Lead Plaintiff;

13 WHEREAS, Reinhard Schroeder has agreed to the selection of his counsel, Murray Frank, as
14 Co-Lead Counsel and Charter Township of Clinton Police & Fire Retirement System and Mark and
15 Karen Gurvey have agreed to the selection of their counsel, Lerach Coughlin, as Co-Lead Counsel
16 for the purchasers of Infineon securities; and

17 WHEREAS, the proposed Lead Plaintiff collectively has the largest financial interest in the
18 relief sought by the class and satisfies the requirements of §21D(a)(3)(B)(iii)(I) of the Exchange Act,
19 15 U.S.C. §78u-4(a)(3)(B)(iii)(I);

20 IT IS HEREBY STIPULATED AND AGREED, by the parties, through their undersigned
21 counsel, as follows:

22 1. Reinhard Schroeder, Charter Township of Clinton Police & Fire Retirement System
23 and Mark and Karen Gurvey shall be appointed Lead Plaintiff for the class of purchasers of Infineon
24 securities between March 13, 2000, and September 15, 2004, pursuant to §21D(a)(3)(B) of the
25 Exchange Act, 15 U.S.C. §78u-4(a)(3)(B);

26 2. Murray Frank and Lerach Coughlin will serve as Co-Lead Counsel for the purchasers
27 of Infineon securities pursuant to §21D(a)(3)(B)(v) of the Exchange Act, 15 U.S.C. §78u-
28 4(a)(3)(B)(v);

1 3. Each of the related actions shall be consolidated for all purposes (the “Consolidated
2 Action”). This Order shall apply to the Consolidated Action and to each case that relates to the same
3 subject matter that is subsequently filed in this Court or is transferred to this Court and is
4 consolidated with the Consolidated Action;

5 4. Every pleading filed in this Action shall have the following caption:

6
7 IN RE INFINEON TECHNOLOGIES AG
8 SECURITIES LITIGATION

Case No. C-04-4156-JW

9
10 DATED: April 4, 2005

Respectfully submitted,

11 MURRAY, FRANK & SAILER LLP
12 BRIAN P. MURRAY (BM-9954)
ERIC J. BELFI (EB-8895)

13 /s/ Eric J. Belfi
14 ERIC J. BELFI

15 DATED: April 4, 2005

16 LERACH COUGHLIN STOIA GELLER
17 RUDMAN & ROBBINS LLP
JOHN K. GRANT
SYLVIA SUM

18
19 /s/ John K. Grant
JOHN K. GRANT

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27 [Proposed] Lead Counsel for Plaintiffs
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ORDER

IT IS SO ORDERED.

DATED: _____

THE HONORABLE JAMES WARE
UNITED STATES DISTRICT JUDGE

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1. That declarant is and was, at all times herein mentioned, a resident of the County of Los Angeles, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 9601 Wilshire Blvd., Suite 510, Los Angeles, California 90210.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 4, 2005, at Los Angeles, California.

DIANA L. HOUCK

INFINEON TECHS (CA)

Service List - 1/10/2005 (04-0381)

Page 1 of 2

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INFINEON TECHS (CA)

Service List - 1/10/2005 (04-0381)

Page 2 of 2

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